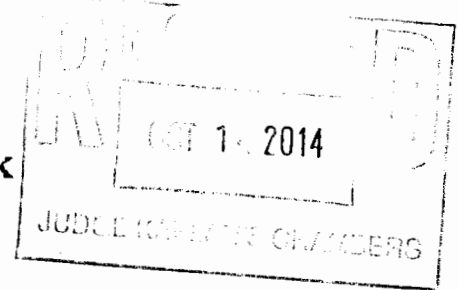


Kaplan, Y.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



VRINGO, INC., and
VRINGO INFRASTRUCTURE, INC.

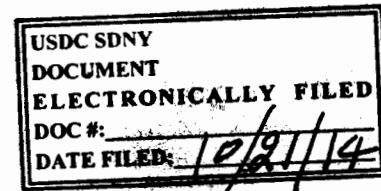
Plaintiffs,

Civil Action No. 14-cv-4988 (LAK)

v.

ZTE CORPORATION, and
ZTE USA Inc.,

Defendants



PROPOSED JOINT DISCOVERY PLAN

The parties hereby submit this proposed Joint Discovery Plan.

<u>Date</u>	<u>Event</u>
3/31/15	Document production to be substantially completed
6/5/15	Fact Discovery to be Completed
7/10/15	Opening expert reports to be served by the party bearing the burden of proof on each issue
8/14/15	Rebuttal expert reports to be served
9/11/15	Expert discovery to be completed
10/15/15	Deadline to file dispositive motions


The parties will exchange Initial Disclosures under Fed. R. Civ. P. 26 (a) (1) by no later than October 10, 2014. The scope, timing and sequencing of discovery shall be as provided in Fed. R. Civ. P. 26 through 35 and the equivalent SDNY Local Rules, except as follows (or further modified by the Court): (1) any deposition using a translator shall not be limited to a

single 7-hour day, but may instead last two 7-hour days; and (2) SDNY Local Rule 33.3 restricting interrogatory substance and timing shall not apply, provided that each party will have forty-five (45) days to respond to any interrogatories.

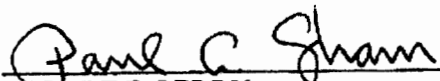
Pursuant to Fed. R. Civ. P. 26(f)(3), plaintiffs state that they believe that privilege issues will arise, including whether communications between the defendants and their Chinese counsel are protected by any attorney client privilege under Chinese and other applicable law.

The parties contemplate submitting to the Court within the next two weeks a Proposed Protective Order. Each party reserves the right to seek to modify the proposed discovery plan for good cause.

DATED: October 9, 2014

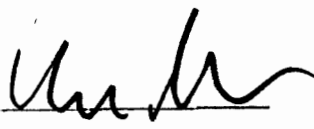

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*Attorneys for Defendants ZTE Corporation and
ZTE (USA) Inc.*

SO ORDERED


10/21/14